

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re)	Chapter 7
)	
Puthenpurakal, Joseph)	Case No. 05-44701-SQU
)	
)	Hon. JOHN H. SQUIRES

**APPLICATION OF TRUSTEE'S COUNSEL OR OTHER PROFESSIONALS
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES**

TO: HONORABLE JOHN H. SQUIRES
BANKRUPTCY JUDGE

GINA B. KROL, counsel for the Trustee pursuant to 11 U.S.C. §330 and FRBP 2016 submits this application for compensation and reimbursement of expenses and represents to the Court as follows:

1. An order for relief under Chapter 7 was entered on October 6, 2005. On March 10, 2006, an order was entered approving the employment of Counsel for the Trustee. Counsel has received \$0.00 in previously awarded compensation and reimbursement of expenses.

2. Applicant requests \$7,976.45, in compensation for 25.03 hours of services performed for the period January 27, 2006 through present and reimbursement of actual expenses in the amount of \$70.43.

3. A description of the nature of the services rendered by the Applicant is as follows:

GENERAL ADMINISTRATION

This case was originally filed as a Chapter 13 proceeding. Upon conversion to Chapter 7, the Debtor amended his Schedule F adding additional creditors. Those creditors did not receive notice of the bar date for filing claims in this case. Cohen & Krol prepared and presented the Trustee's application to set bar date for those creditors and mailed notices of said bar date. Cohen & Krol expended 1.50 hours in the activity of General Administration.

OBJECTION TO CLAIM

Wells Fargo filed a secured claim in this case. Since this was not a secured claim against the funds currently held by the Trustee, but rather was a mortgage lien, Cohen & Krol prepared

and presented the Trustee's Objection to Claim. That Objection was sustained. Cohen & Krol expended 1.55 hours in the activity of Objection to Claim.

PREFERENCE LITIGATION

The Trustee identified several creditors which received repayment from the recent refinance of the Debtor's home. Trustee believed these payments to be preferential in nature and instructed Cohen & Krol to prepare adversary proceedings to recover the payments. Cohen & Krol prepared pre-filing demand letters to potential preference defendants, engaged in informal and formal discovery proceedings, communicated with said preference litigants, negotiated settlements of the adversary proceedings and obtained the requisite Court approvals authorizing the Trustee to settle the litigation. Cohen & Krol expended 20.48 hours in the activity of Preference Litigation.

PROFESSIONAL EMPLOYMENT

Cohen & Krol prepared and presented the Trustee's Motion to Employ Attorneys for the Trustee as was required to further the administration of this Estate. Cohen & Krol expended 1.50 hours in the activity of Professional Employment.

4. Attached as Exhibit "A" is an itemized statement of the legal services rendered. The statement reflects the legal services rendered, the time expended and a description of the work performed.

5. The time expended and services rendered by Applicant is summarized as follows:

<u>Attorney</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
GINA B. KROL/GBK2006	6.10	350.00	2,135.00
LINDA M. KUJACA/LMK2006	15.78	290.00	4,576.20
LINDA M. KUJACA/LMK2007	.10	300.00	30.00
GINA B. KROL/GBK2009	3.05	405.00	1,235.25

6. Attached as Exhibit "B" is an itemized statement of the actual expenses incurred by the Applicant.

7. Based on the nature, extent and value of services performed by the Applicant, the results achieved, and the costs of comparable services, the compensation and reimbursement of expenses sought are fair and reasonable.

8. At all times during Applicant's representation of the Trustee, Applicant was a disinterested person and neither represented nor held an interest adverse to the estate with respect to matters on which Applicant was employed.

WHEREFORE, Applicant requests that it be awarded reasonable compensation of \$7,976.45 and reimbursement of actual and necessary expenses of \$70.43 for legal services rendered in this case.

RESPECTFULLY SUBMITTED,

Date: August 6, 2009

/s/ Gina B. Krol

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